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2 District of Nevada  
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7 *Attorneys for the United States*

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9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

10 Bo Zhang, an individual,  
11 Plaintiff,

12 v.

13 U.S. Citizenship and Immigration Services  
14 Las Vegas Field Office,  
15 Defendant.

Case No. 2:24-cv-02152-JCM-EJY

**Stipulation to Extend United States'**  
**Deadline to File Response to Plaintiff's**  
**Complaint**

**(First Request)**

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17 Plaintiff, Bo Zhang, through counsel and the United States of America on behalf of  
18 Federal Defendants, through undersigned counsel, hereby stipulate and agree as follows:

- 19 1. Plaintiff filed the Complaint on November 18, 2024 (ECF No. 1).  
20 2. Plaintiff served the United States with a copy of the Summons and  
21 Complaint on November 20, 2024.  
22 3. The current deadline for the United States to respond to the Plaintiff's  
23 Complaint is January 21, 2025.

24 Plaintiff and the United States, through undersigned counsel, agree and stipulate  
25 that the United States' time to respond to the Plaintiff's Complaint shall be extended to  
26 February 4, 2025.

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1 The United States requires additional time to obtain the underlying file from United  
2 States Citizenship and Immigration Services, to review the information received, and to  
3 respond to Plaintiff's Complaint.

4 Therefore, the parties request that the Court extend the deadline for the United  
5 States to file a responsive pleading to Plaintiff's Complaint to February 4, 2025.

6 This stipulated request is filed in good faith and not for the purpose of undue delay.

7 Respectfully submitted this 27th day of January 2025.

8  
9 SUE FAHAMI  
Acting United States Attorney

10 /s/ Yao (Kelvin) Wen, Esq.  
11 YAO (KELVIN) WEN, Esq.  
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12 411 E. Bonneville Ave. #150  
Las Vegas, Nevada 89101

/s/ Karissa D. Neff  
KARISSA D. NEFF  
Assistant United States Attorney

*Attorneys for the United States*

13 *Attorney for Plaintiff*

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15 **IT IS SO ORDERED:**

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18 **UNITED STATES MAGISTRATE JUDGE**

19 **DATED:** January 27, 2025  
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